

CASE NO. _____

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entity known as AT&T MOBILITY, LLC,; §  
all of whose true and correct names are §  
otherwise unknown at this time, but will be §  
added by amendment when ascertained; §  
§

*Defendants.*

**DEFENDANT SEQUIUM ASSET SOLUTIONS, LLC'S NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Sequium Asset Solutions, LLC ("SAS") hereby removes the subject action from the Circuit Court of Limestone County, Alabama, to the United States District Court for the Northern District of Alabama, Northeastern Division, on the following grounds:

1. Plaintiff Christopher Hill instituted an action in the Circuit Court of Limestone County, Alabama, on August 18, 2020. A copy of the Complaint is attached hereto as **Exhibit A**.
2. SAS was served with process on August 21, 2020. Therefore, removal is timely.
3. Plaintiff's Complaint alleges a violation of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. ("FDCPA").
4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. §1331, as there is a federal question. This suit falls within the FDCPA which thus supplies the federal question.
5. Pursuant to 28 U.S.C. §1441, et seq., this cause may be removed from the Circuit Court of Limestone County, Alabama, to the United States District Court for the Northern District of Alabama, Northeastern Division.
6. Notice of this removal will be promptly filed with the Circuit Court of Limestone County, Alabama, and served on all adverse parties.

7. Pursuant to 28 U.S.C. §1446(a), copies of all process, pleadings, orders and other papers filed in this action and obtained by Defendant are attached hereto and marked as composite **Exhibit B** and incorporated herein by reference.

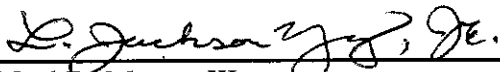
8. Plaintiff made a jury demand in state court.

9. Defendant AT&T Mobility, LLC was served with process on August 24, 2020. AT&T Mobility, LLC consents to the removal of this action from the Circuit Court of Limestone County, Alabama, to the United States District Court for the Northern District of Alabama, Northeastern Division. *See* Defendant AT&T Mobility, LLC's joinder in and consent to notice of removal, attached hereto as **Exhibit C**.

WHEREFORE, PREMISES CONSIDERED, Defendant Sequium Asset Solutions, LLC removes the subject action from the Circuit Court of Limestone County, Alabama, to the United States District Court for the Northern District of Alabama, Northeastern Division.

Dated: September 18, 2020

Respectfully submitted,

  
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Neal D. Moore, III  
L. Jackson Young, Jr.  
*Attorney for Defendant*  
*Sequium Asset Solutions, LLC*

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 18th day of September, 2020, I caused the foregoing to be electronically filed with the Clerk of the Court via Alafile, which will send a notice of electronic filing to all counsel and parties of record:

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OF COUNSEL